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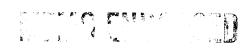
Dan Nelson

Kevin P. McCulloch

January 19, 2016

VIA ECF AND FACSIMILE

Honorable Laura T. Swain United States District Court Southern District of New York 500 Pearl Street, Room 620 New York, NY 10007



Senisi v. John Wiley & Sons, Inc., No. 13-cv-3314 (LTS) (AJP)

Dear Judge Swain,

This firm is counsel for Plaintiff Ellen Senisi ("Plaintiff") in the above-referenced case against Defendant John Wiley & Sons, Inc. ("Defendant"). I write to request that the Court stay the pre-trial conference and related preceding deadlines pending the Court's ruling on Plaintiff's motion for reconsideration or, in the alternative, for certification of the Court's rulings as a final judgment and to stay this action pending appeal. There is good cause to stay these deadlines as the Court's resolution of Plaintiff's motion will dramatically affect the parties' pre-trial positions and may moot the need for the pretrial conference entirely.

As required by Your Honor's Individual Practices, I have conferred with counsel for Defendant regarding the requested relief and have been advised that Wiley does not oppose this application for a stay, but intends to oppose the motion for reconsideration/certification on both procedural and substantive grounds. Counsel for both parties further request that in the event that Plaintiff's motion for a stay is denied, the Court set new deadlines for the exchange of exhibit and witness lists between the parties and the filing of in limine motions, such that the deadline to exchange the exhibit and witness lists is 14 days after such denial and the deadline to file in limine motions is 21 days after such denial.

The stay and pre-conformal submission solutures requests an granted DE #218 resolved.

Respectfully submitted, Kenn Malle -

Kevin McCulloch

SO ORDERED:

HON LAURA TAYLOR SWAIN *Admitted in NY and CO UNITED STATES DISTRICT JUDGEAdmitted in NY and DC

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